TECHNICAL REVIEW DOCUMENT
For
Renewal
of
OPERATING PERMIT 95OPWE103

to be issued to:

DCP Midstream, LP.
Lucerne Gas Processing Plant
Weld County
Source ID 1230107

Prepared by Lisa Clarke
August – November 2007

I. PURPOSE

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued November 1, 1998, and expired on November 1, 2003. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted October 31, 2002; additional information received August 29, 2003; October 19 and December 9, 2004; March 14, September 20, November 29, and November 30, 2005; February 22, 2006; January 8, January 15, February 27, March 15, March 29, May 15, and August 9, 2007; previous inspection reports, and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at http://www.cdphe.state.co.us/ap/Titlev.html.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

In addition to the changes requested by DCP Midstream in the renewal application, the Division has included changes to make the permit consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

II. SOURCE DESCRIPTION

The Lucerne Gas Processing Plant is a natural gas processing plant and compressor station designed to extract natural gas liquids from field-produced natural gas, and recompress the processed gas prior to transmission to the sales pipeline. Field gas is first charged to a separator where liquids formed during transport to the plant are separated from the gas stream. The gas stream discharged from the separator is processed through a glycol contact tower, where moisture contained in the gas stream is absorbed by ethylene glycol. The moisture-laden glycol discharged from the contactor is regenerated in a reboiler. The absorbed water volatilizes and is discharged to the atmosphere. The glycol solution is recirculated to the contactor.

After the glycol contactor has removed the moisture in the gas, the gas stream is fed to the processing plant, where it is chilled by a propane refrigeration system. Natural gas liquids formed during this process are stored in tanks and transported offsite by truck.

The process uses natural gas compressors powered by ten (10) reciprocating internal combustion (IC) engines. Four (4) 1,232 HP IC engines and one (1) 1,380 IC engine are used for inlet gas compression and a 220 HP engine drives the air compressor. For refrigeration, one (1) 1,478 HP IC engine is used. Three (3) 1,232 HP IC engines are used for compressing the residual gas to the discharge pipeline pressure.

The plant is located near Lucerne in Weld County, Colorado. The area in which the plant operates is classified as attainment for all pollutants except ozone. It is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16. Wyoming is an affected state within 50 miles of the plant. Rocky Mountain National Park is a Federal Class I designated areas within 100 kilometers of the plant.

MACT Applicability

HHH – Natural Gas Transmission and Storage

This facility is a natural gas transmission and storage facility as described in 40 CFR Part 63 Subpart HHH, "National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage". However, this facility is a true minor source of Hazardous Air Pollutants (HAPs). Therefore, this facility is not subject to this MACT.

HH – Oil and Natural Gas Production Facilities

In addition to this facility being a true minor of HAPs, there is not a dehydrator present to possibly make the facility subject to the area source provisions of the MACT HH. Therefore, this facility is not subject to this MACT.

ZZZZ – Stationary Reciprocating Internal Combustion Engines

The final rule for RICE was published in the Federal Register on June 15, 2004. Under the rule, for production field facilities, only emissions from glycol dehydrators, storage vessel with the potential for flash emissions, reciprocating internal combustion engines and combustion turbines need to be aggregated to determine if the facility is a major source for HAPS. An analysis was conducted to determine HAP emissions from the equipment at this facility. Total HAP emissions based on permitted production were calculated to be 6.30 TPY, with no single HAP exceeding 4 TPY. This facility is a true minor source of HAPs. Therefore, the RICE MACT does not apply to the Lucerne gas processing plant.

Compliance Assurance Monitoring (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold (100 tons per year). They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

C-105, C-106, C-107, C-108, C-109, C-110, C-112, C-113 – Waukesha Model L-7042 GSI ICE
C-178 – Waukesha Model L-5794 GSI ICE

The primary purpose of the CAM program is to supplement or enhance the Operating Permit monitoring requirements as necessary to adequately demonstrate compliance. The exhaust gas temperature on each engine is monitored continuously with thermocouples. The pressure drop across the catalyst is measured in inches of water with a continuously operating manometer. The proper performance envelopes for the control device parameters being monitored are any temperature between 750 °F and 1250 °F and a pressure drop within three inches of water.

The CAM provisions require a source to monitor at least one indicator of performance per control device and to perform at least one parameter observation per 24 hours. DCP selected to continuously monitor the exhaust gas outlet temperature and pressure drop across the catalyst. The daily measurement frequency satisfies the minimum CAM requirement.

Emissions

The following table presents the facility-wide Potential To Emit (PTE).

Pollutant	Potential to Emit (tpy)	Actual (tpy) Data Year 2006
NOx	248.5	193.3
VOC (including fugitive VOCs)	112.0	97.4
CO	232.8	195.6
HAPs (for informational purposes only)	6.91	5.57

The potential emissions classify this plant as a major source with respect to Prevention of Significant Deterioration (PSD) requirements. However, the permitted emissions classify this plant as a synthetic minor source with respect to Prevention of Significant Deterioration (PSD) requirements. All of the larger engines have non-selective catalytic reduction units and air/fuel ratio controllers to control emissions. The only uncontrolled unit at this facility is the 220 HP Caterpillar G-3306TA engine. The actual emissions from 2006 are lower than the PTE because of a change in the fugitive emissions and the addition of the two Waukesha 1,478 and 1,380 HP engines to the facility.

This plant is located in an area designated as attainment for all pollutants except ozone. Based on the information provided in the Title V application, this facility is categorized as a NANSR major stationary source (Potential to Emit of VOC or NOx $\geq$ 100 Tons/Year). Future modifications at this facility resulting in a significant net emissions increase (see Reg 3, Part D, Sections II.A.26 and 42) for VOC or NOx or a modification which is major by itself (i.e. a Potential to Emit of $\geq$ 100 TPY of either VOC or NOx) may result in the application of the NANSR review requirements.

Based on the information provided by the applicant, this source is categorized as a minor stationary source for PSD as of the issue date of this permit. Any future modification which is major by itself (Potential to Emit of $\geq$ 250 TPY (use 100 TPY if a listed source category)) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

Emission Sources

The following sources are specifically regulated under terms and conditions of the Operating Permit for this plant:

Fugitive Emissions of Volatile Organic Compounds from Equipment Leaks (P007)
Internal Combustion Engines
C-106, C-110, C-107, C-109, C-112, C-113, C-108 – Waukesha L-7042GSI 1,232 HP engines
C-108 – Waukesha L-7042 GSI 1,478 HP engine
C-178 – Waukesha L-5794 GSI 1,380 HP engine
C-244 – Caterpillar G03306TA 220 HP engine

The existing permit requires DCP to monitor the gas methane/ethane composition to demonstrate the gas quality was consistent. DCP requested this requirement not be included in the renewal because sufficient data had been generated to demonstrate a consistent gas quality. The change was made as requested. The permitting language was updated to make the permit consistent with the standard language currently used in the permits.

Accidental Release Program (112(r))

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provisions must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule.

Based on the information provided by the applicant, this facility is subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act). The Risk Management Plan required by the Act was submitted to the appropriate authority and/or a designated central location by June 20, 1999 and revised on April 18, 2007.

Emission Factors

From time to time published emission factors are changed based on new or improved data. A logical concern is what happens if the use of the new emission factor in a calculation results in a source being out of compliance with a permit limit. For this operating permit, the emission factors or emission factor equations included in the permit are considered to be fixed until changed by the permit. Obviously, factors dependent on the fuel sulfur content or heat content cannot be fixed and will vary with the test results. The formula for determining the emission factors is, however, fixed. It is the responsibility of the permittee to be aware of changes in the factors, and to notify the Division in writing of impacts on the permit requirements when there is a change in factors. Upon notification, the Division will work with the permittee to address the situation.

III. DISCUSSION OF MODIFICATIONS MADE

Source Requested Modifications

- **Fugitive VOC Emissions – Construction Permit 04WE1303**

DCP requested the addition of fugitive emissions from equipment leaks, Construction Permit 04WE1303, to be added to the plant. Emissions will be emitted from component leaks. A revised APEN was received 8/9/2007 to request a more appropriate VOC limit.

1. Applicable Requirements –
    - 10.20 TPY VOC emissions.
    - Compliance with NSPS KKK
    - The source must submit a NSPS KKK report detailing the specific applicable and non-applicable requirements of NSPS KKK within 6 months of permit issuance. This report will be reviewed and used by the inspector to determine compliance.

2. Emission Factors- Emissions are determined using appropriate emission factors from the EPA document: Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017).

3. Monitoring Plan – The source must conduct a component count within 90 days of permit issuance. Records of component changes shall be maintained and a physical hard count shall be conducted at least every five years.

- **Engines – Construction Permit 96WE905**
  DCP requested that the Division remove two of the engines from the permit (P002 & P006) and modify the other engines (P001, P003) to Waukesha L-7042 1,232 HP engines. The engines P001 and P003 are now labeled C-106 and C-110, accordingly. The previous permit incorrectly eliminated engines P004 and P005 from the permit. DCP requested that these engines be re-incorporated into the permit as Waukesha L-7042GSI 1,232 HP engines and labeled as C-107 and C-109, accordingly.

- **Engines – Construction Permits 04WE1301, 04WE1302, and 05WE0958**
  DCP requested that these engines be incorporated into the Title V permit. The engines are all Waukesha L-7042GSI 1,232 HP engines. These engines are now labeled C-112, previously C-1 (CP# 04WE1301), and C-113, previously C-2 (CP#04WE1302). The engine in construction permit was permitted as C-115 and is now labeled C-108.

- **Engines – Construction Permit 07WE0021**
  The Division added this recent construction permit of a Waukesha L-7042GSI 1,478 HP engine (C-105) into the Operating Permit. The renewal Operating Permit requires the source to conduct initial compliance testing on this engine within 180 days of start-up for formaldehyde, carbon monoxide, nitrogen oxides, and oxygen.

- **Engines – Construction Permit 07WE0979**
  The Division added this recent construction permit of a Waukesha L-5794 GSI 1,380 HP engine (C-178) into the Operating Permit. The renewal Operating Permit requires the source to conduct initial compliance testing on this engine within 180 days of start-up for carbon monoxide, nitrogen oxides, and oxygen.

  The table below summarizes all the changes made to the engines listed above in this renewal.

Table 1: Engine Change Summary

Previous	Current Source	AIRS ID	Construction	Date Change

Source ID	ID		Permit	Requested
P001	C-106	015	96WE905	3/15/2007
P003	C-110	017	96WE905	3/15/2007
P004	C-107	018	96WE905	3/15/2007
P005	C-109	019	96WE905	3/15/2007
C-112	C-1	024	04WE1301	10/19/2004
C-113	C-2	025	04WE1302	10/19/2004
C-115	C-108	029	05WE0958	3/15/2007
C-105	C-105	032	07WE0021	n/a
C-178	C-178	033	07WE0979	n/a

Applicable Requirements – The conditions of the construction permit were added to the Operating Permit. The Title V application identifies these engines are 4-cycle, rich burn engines equipped with air-fuel ratio controllers, turbochargers, and non-selective catalytic reduction for emission control. These engines could be subject to the Maximum Achievable Control Technology (MACT) of 40 CFR 63, Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT). However, this facility is considered a True Minor source of HAPs, and MACT ZZZZ does not apply. DCP did not submit a CAM plan for the eight compressor engines for this facility. Therefore, the Division developed a CAM Plan for these engines based on the RICE MACT. The engines have all started up, except for C-105 and C-178, which have yet to be installed and will still need to conduct testing at the time of permit issuance. The start up dates for the other engines are as follows:
C-106 – 6/4/2006
C-110 – 6/4/2006
C-107 – 7/13/2006
C-109 – 6/4/2006
C-112 – 5/3/2005
C-113 – 6/23/2005
C-108 – 6/26/2006

2. Emission Factors – The emission factors for NO_x, VOC, and CO were reported in the Title V application in terms of g/hp-hr. The Division converted the emission factors to a fuel based emission factor (lb/MMBtu) based on the engine design data and higher fuel heating value. The emission factors are listed in the table below. Details of the conversion can be found in the files on the O:\ hard drive under LMC/DCP Lucerne and in the file.

Pollutant	**Reported Emission Factor**	**Fuel Based Factor**
NO_x	2.0 grams/hp-hr	0.57 lbs/MMBtu
CO	2.0 grams/hp-hr	0.57 lbs/MMBtu
VOC	1.0 grams/hp-hr	0.28 lbs/MMBtu

The engines in this permit have not yet been initially tested. Therefore, initial testing on all engines at this facility is required.

3. Monitoring Plan - The operating permit has established a procedure for the

calculation of emissions based on fuel consumption and a fuel based emission factor. The fuel consumption of each engine is determined by allocating fuel use to each of the engines based on monthly hours of operation and total engine fuel use.

The Division's current (6/1/2006) portable monitoring language has been included in the permit. This requires the source to measure NO_x and CO emissions quarterly.

The Btu content of the natural gas fuel shall be measured semi-annually (twice per year) using appropriate methods. DCP is also required to monitor the air fuel ratio controller.

CAM Plan Review

DCP did not initially submit a CAM Plan for these sources. Therefore, the Division developed a CAM Plan for these engines based on the RICE MACT. The Division-approved CAM Plan contains two indicators: temperature of the exhaust gas into the catalyst and the pressure drop across the catalyst. The indicator ranges are a temperature between 750º F and 1250º F and ± 3 inches of water, respectively. The temperature into the catalyst shall be measured at a minimum daily and the pressure drop recorded once per month.

- **Engines – Incorporated into Operating Permit – Caterpillar G3306TA 220 HP**
  DCP has requested that the Division add this engine to the permit (C-244). This engine is uncontrolled as it is below Regulation 7 thresholds for engine control.

  1. Applicable Requirements - The Title V application identifies this engine as a 4-cycle, rich burn engine that is uncontrolled. This engine could be subject to the Maximum Achievable Control Technology (MACT) of 40 CFR 63, Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT). However, this facility is considered a True Minor source of HAPs, and MACT ZZZZ does not apply.

  2. Emission Factors - The emission factors for NO_x, VOC, and CO were reported in the Title V application in terms of g/hp-hr. The Division converted the emission factors to a fuel based emission factor (lb/MMBtu) based on the engine design data and higher fuel heating value. The emission factors are listed in the table below. Details of the conversion can be found in the files on the O:\ hard drive under LMC/DCP Lucerne and in the file. The renewal Operating Permit requires the source to conduct initial compliance testing on the engine within 180 days of start-up for formaldehyde, carbon monoxide, nitrogen oxides, and oxygen.

Pollutant	Reported Emission Factor	Fuel Based Factor
NO_x	11.4 grams/hp-hr	3.25 lbs/MMBtu

CO	12.7 grams/hp-hr	3.62 lbs/MMBtu
VOC	1.0 grams/hp-hr	0.29 lbs/MMBtu

3. Monitoring Plan - The operating permit has established a procedure for the calculation of emissions based on fuel consumption and a fuel based emission factor. The fuel consumption of each engine is determined by allocating fuel use to each of the engines based on monthly hours of operation and total engine fuel use.

   The Division's current (6/1/2006) portable monitoring language has been included in the permit. This requires the source to measure NO_x and CO emissions quarterly.

   The Btu content of the natural gas fuel shall be measured semi-annually (twice per year) using appropriate methods.

- **6 MMBtu/Hr Natural Gas Fired Heater – Construction Permit exempt 05WE0959**
  DCP requested that the Division add this APEN required, permit exempt source into the Operating Permit.

  1. Applicable Requirements – Since this source is permit exempt, the only requirements that apply to this heater are the compliance emission factors, the natural gas consumption of this source, the 20% opacity requirement, and correct unit operation.

  2. Emission Factors – The emission factors for this heater were obtained from AP-42 Table 1.4-2 and adjusted for the fuel heat content of 1040 Btu per standard cubic feet of gas. These emission factors are listed in the table below:

Pollutant	**Reported Emission Factor**
NO_x	100 lbs/MMScf
CO	84 lbs/MMScf
PM/PM_{10}	7.6 lbs/MMScf
VOC	5.5 lbs/MMScf

  3. Monitoring Plan - The operating permit has established a procedure for the calculations of annual emissions using the emission factors listed above and the actual fuel consumption. The source shall also maintain annual of the actual consumption rates of natural gas.

- The responsible official and contact person was updated as requested by DCP.
- The company name has been changed from Duke Energy Field Services, LP to DCP Midstream, LP.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

These changes are as follows:

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It should be noted that the monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

- Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

Section I – General Activities and Summary

- The description of the source was updated to reflect the current status of the facility.
- The attainment status of Weld County was updated to reflect the current ozone nonattainment status of this area.
- Condition 1.3 was updated to reflect all of the correct incorporated Construction Permits.
- Conditions 13 and 17 in Condition 1.4 were renumbered to 14 and 18 and Condition 21 in Condition 1.5 was renumbered to 22. The renumbering changes were necessary due to the addition of the Common Provisions requirements in the General Conditions of the permit.
- In Condition 1.4, General Condition 3.g (new general condition for general provisions) was added as a State-only requirement.
- The language for the alternative operating scenario for temporary and permanent engine replacement was updated to reflect current language (6/1/2006 version). The AOS table was also updated to reflect the engines at the facility that are applicable.
- Added a "new" Section 5 for CAM.
- Summary table 6.1 has been updated.

Section II – Specific Permit Terms

- This section was completely revised. Sections II.2, 3, 4, and 5 were deleted since those sources have been removed from the facility. Section II.6 was changed to Section II.1, which is described below.

Section II.1 – P007 – Fugitive Equipment Leaks

- This section was moved from section 6 for organizational purposes.
- Condition 1.1 was changed per the APEN received on 8/9/2007 to reflect the most accurate emissions.
- Added conditions 1.2 and 1.3 – this facility is subject to NSPS KKK. The equipment leaks and the facility as a whole has been modified after January 20, 1984.

Section II.2 – C-106, C-110, C-107, C-109, C-112, C-113 – Waukesha 1,232 HP Natural Gas-Fired Internal Combustion Engines equipped with NSCR

- Condition 2.1 - Added emission limits & calculation.
- Condition 2.2 – Put in fuel use limitations.
- Condition 2.3 - Added portable monitoring requirement.
- Condition 2.4 – Included opacity requirement.
- Condition 2.5 – Added verification of natural gas Btu content.
- Condition 2.6 – Inserted good operation and maintenance requirement.
- Condition 2.7 - Required source to record operating hours.
- Condition 2.8 – Required source to monitor air/fuel ratio controller.
- Condition 2.9 – Added CAM Plan (outlined in Section II.7).
- Condition 2.10 – Added the Control of Emissions from Stationary and Portable engines in the 8-hour Ozone Control (Nonattainment) Area.
- Condition 2.11 – Inserted testing requirement.

Section II.3 – Waukesha 1,478 HP Compressor Engine with NSCR

- Condition 3.1 – Added emission limits & calculation.
- Condition 3.2 – Put in fuel use limitations.

- Condition 3.3 – Added portable monitoring requirement.
- Condition 3.4 – Included opacity requirement.
- Condition 3.5 – Added verification of natural gas Btu content.
- Condition 3.6 – Inserted good operation and maintenance requirement.
- Condition 3.7 - Required source to record operating hours.
- Condition 3.8 – Required source to monitor air/fuel ratio controller.
- Condition 3.9 – Added CAM Plan (outlined in Section II.7).
- Condition 3.10 – Added the Control of Emissions from Stationary and Portable engines in the 8-hour Ozone Control (Nonattainment) Area.
- Condition 3.11 – Inserted testing requirement (new engine).

Section II.4 – C-178 – Waukesha 1,380 HP Compressor Engine with NSCR

- Condition 4.1 – Added emission limits & calculation.
- Condition 4.2 – Put in fuel use limitations.
- Condition 4.3 – Added portable monitoring requirement.
- Condition 4.4 – Included opacity requirement.
- Condition 4.5 – Added verification of natural gas Btu content.
- Condition 4.6 – Inserted good operation and maintenance requirement.
- Condition 4.7 - Required source to record operating hours.
- Condition 4.8 – Required source to submit serial number of engine within 180 days after startup of engine.
- Condition 4.9 – Required source to monitor air/fuel ratio controller.
- Condition 4.10 – Added CAM Plan (outlined in Section II.7).
- Condition 4.11 – Added the Control of Emissions from Stationary and Portable engines in the 8-hour Ozone Control (Nonattainment) Area.
- Condition 4.12 – Inserted testing requirement (new engine).

Section II.5 – C-244 – Caterpillar 220 HP Compressor Engine

- Condition 5.1 – Added emission limits & calculation.

- Condition 5.2 – Put in fuel use limitations.
- Condition 5.3 – Added portable monitoring requirement.
- Condition 5.4 – Included opacity requirement.
- Condition 5.5 – Added verification of natural gas Btu content.
- Condition 5.6 – Inserted good operation and maintenance requirement.
- Condition 5.7 - Required source to record operating hours.
- Condition 5.8 – Inserted testing requirement (new engine).

Section II.6 – H001 – 6 MMBtu/hr Natural Gas Fired Heater

- Condition 6.1 – Added annual emissions calculation requirement.
- Condition 6.2 – Put in annual natural gas fuel consumption rate requirement.
- Condition 6.3 – Added opacity requirement.
- Condition 6.4 – Inserted good operation and maintenance requirement.

Section II.7 - "new" section – Added CAM requirements.

Section II.8, 9

- Updated fuel based emission factors table in Calculations section (now Section II.9) and calculations.
- Removed conditions Compliance Testing, Documents Required, Insignificant Activities, and Reporting (previously sections II.9, 10, 11, and 12).

Section III, Condition 3

- Updated applicable emission unit descriptions and numbers.
- Added Stream-lined Requirements.

Section IV

- Updated General Conditions to version 02/20/2007.

Appendix A

- Updated plot plan submittal date.
- Added P015 (Condensate Truck Loadout) and P018 (Pressurized Tank Truck Loadout) to list of insignificant activities.

Appendices B & C

- Updated to 2/2/2007 version.
- Updated report tables to current facility units.

Appendix D

- Updated EPA address.

Appendix G – “new appendix

- Added Compliance Assurance Monitoring Plan.